



October 17, 2018

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VIA ECFS

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Re: FCC WC Docket No. 18-156

My name is Leo A. Wrobel<sup>1</sup> and I am the founder and CEO of FailSafe Communications Inc. (Exhibit 1) Our company is a Texas based end user of telecommunications services employed during emergencies, service outages and mass calling events for police, fire departments, 911, banks, hospitals and others. (Exhibit 2)

On [September 13, 2019](#) and [October 3, 2019](#) we filed letters in a related Docket that expressed serious concerns about how action by this Agency may affect emergency, 911, and call overflow traffic to the FailSafe cloud.<sup>2</sup> Those letters also offered policy opinions as a telecommunications expert and as a former Mayor with previous responsibilities over police, fire, 911 and public safety systems.<sup>3</sup> (See hyperlinks) Stated simply, the proposed Order in both Docket 18-155 and 18-156 would deprive millions of small and medium sized businesses (SMBs) of a viable and affordable disaster recovery system.

On [October 15, 2019](#) this Agency responded commendably by participating in conference with the undersigned and with the Office of Advocacy for the U.S. Small Business Administration. As a result of that conference, the Parties were in general agreement that the issues discussed may be broader in scope than those contained in Docket 18-155. That proceeding centers primarily on bad actors engaged in businesses or practices that are largely unrelated to FailSafe, which is neither a common carrier nor an access stimulator. Since the FailSafe cloud makes extensive use of 8YY services however, some of the discussions overlapped with 18-156. We are therefore filing comments in this Docket 18-156 for completeness, and to formally request the same specific **Exemptions** from the Final Order based on the following:

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1 Mr. Wrobel has been a disaster recovery expert for over 30 years, having personally designed and built telecommunications disaster recovery systems for American Airlines, USAA, Southern Methodist University and others. He has written dozens of corporate disaster recovery plans for such names as Fidelity Investments, Reliance Electric, and Dana Corporation. He is the author of 12 [books](#) and 1600 [articles](#) on the topic of disaster recovery. (See [Exhibit 1](#))

2 [Updating the Existing Carrier Compensation Scheme to Avoid Access Arbitrage](#), FCC WC Docket 18-155.

3 The undersigned further opined on “Sunny Day” 911 Outages, and how to allow ITCOs to exploit a \$12 billion market for Disaster Recovery as a Service (DRaaS) market rather than relying upon taxes, surcharges and subsidies. See comments of FailSafe Communications filed in Docket 18-155.

1. The Web Call Controller™ used by FailSafe is virtually 100% based on 8YY traffic, but that's where any similarity to the issues contained in this Docket ends. FailSafe has never engaged in CABS splitting with its ILEC and CLEC suppliers. CABS revenue generated by FailSafe and its end users is retained 100% by the ILEC or CLEC supplier under rules applicable to each carrier and long established under state and federal law. FailSafe often leases surplus landline capacity from small Independent Telephone Company (ITCO) suppliers at lawfully tariffed rates and has done so for years. The tariffed landlines are on 499A reports, pay applicable taxes and EUCL fees, and serve bona-fide end users. In short, the Web Call Controller™ was not invented 13 years ago to engage in some sort of access revenue scheme.
2. FailSafe uses small ITCOs and CLECs because they are more responsive in disasters than major carriers who might be otherwise engaged. Small ITCOs and CLECs are also located outside major metropolitan areas which can be telecom choke points and natural targets for terrorism. The fact that these small carriers found something in FailSafe that they could do and wanted a piece of the action enjoyed by the large incumbents, should come as no surprise to anyone.<sup>4</sup>
3. Every one of the major incumbent ILEC/IXC providers have been generating call traffic to the Web Call Controller™ for 13 years. Each of these major companies has been getting paid CABS revenue for that traffic and continues to do so. So far this year the Web Call Controller™ has handled over 236,967 calls, and millions more since its inception. The calls came from such places as 15 rural hospitals, from 911 centers and from small commercial businesses like credit unions that could not otherwise afford a disaster recovery / call overflow system. Virtually all of these were originating 8YY calls.<sup>5</sup> As far as matters of fairness and policy, if this Agency were to treat FailSafe's small ITCO suppliers differently than larger companies who have originated traffic to the Web Call Controller™ for 13 years it would be patently unfair and discriminatory.<sup>6</sup> Moreover, depriving small carriers of the first profitable and *legitimate* service available to them in many years would be contrary to the public interest as well.

### **Formal Request for Exemption of Emergency Services and Overflow Traffic**

The same potential for unintended consequences exists in Docket 18-156 as in Docket 18-155. An overly-broad Order would destroy the only Disaster Recovery option available to millions of SMBs. At a minimum, it would price SMBs out of a Disaster Recovery/call overflow solution due to loss of the CABS contribution. We are therefore requesting the same Exemptions in this Docket as in 18-155.<sup>7</sup>

1. An indefinite Exemption from “Bill and Keep” for CABS access traffic associated with bona-fide SMB end users with less than 24 phone lines. Small end users will have difficulty affording a cloud-based disaster recovery system if the tariffed services that form the points of ingress and egress to that system skyrocket in price after loss of the CABS subsidy. This exemption is intended to protect SMB users from being priced out of their disaster recovery and call overflow solution by preserving the use of CABS on emergency and call overflow traffic.
2. A three year phase out of CABS Before “Bill and Keep” for other services related to emergency communications. This is intended as a reasonable interim measure designed to help the ITCO industry transition from a CABS based environment to a cloud usage based environment. The same systems that measure CABS today are capable of measuring cloud usage tomorrow. This exemption would allow small ITCOs the benefit by transitioning into cloud services without a large capital investment. In fact, some of FailSafe's ITCO clients are right in the midst of their transition from a CABS environment to a cloud environment. To suddenly change the rules would be an unfair financial burden to these small organizations.

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4 These include handling our 8YY calls, “pitching,” “catching,” “white labeling,” etc. See [Exhibit 1](#).

5 In the October 15, 2019 conference there was general agreement that originating traffic such as 8YY and 1+ would not be impacted, but references to “*originating and /or terminating*” still exist in the Proposed Order. They should be clarified to avoid ambiguity.

6 This Agency is subject to the auspices of the Administrative Procedure Act insofar as it must not be arbitrary and capricious. It understands that courts have found this Agency “*must provide adequate explanation before it treats similarly situated parties differently.*” See Page 32 of September 5, 2019 Report and Order Modification Docket 18-155 at 82.

7 The RFA requires agencies to adopt regulations that impose the least burden on small entities, or to mandate [Exemptions](#) for small entities. Set in this context we have requested an Exemption under the RFA rules to certain aspects of the proposed Order.

## Summary

In Docket 18-155 this Agency declined to grant these exemptions “*at this time.*” Upon information and belief the matter is still under review within the Agency,<sup>8</sup> While deeply appreciative of any results from such a review or analysis, the undersigned believes this matter is still ripe for a decision for the following reasons:

- The Exemptions are geared specifically and narrowly to emergency and overflow communications.
- They would not undermine the intent of this Agencies Draft Report and Order in this Docket.
- They are in the public interest with regard to their impact on emergency services, and in the interest of *every carrier* by mitigating their liability in Sunny Day 911 outages.
- They comport with the RFA by eliminating Significant and Substantial economic burdens on SMBs.<sup>9</sup>
- They make economic sense to ITCOs in terms of profitability and transition to cloud services.

Granting FailSafe's Exemptions would eliminate ambiguity in the eyes of FailSafe's underlying carriers by establishing the ground rules clearly, and up front. Absent these clarifications, carriers could be disinclined to participate in an emergency system that is clearly in the public interest, for fear of future misunderstandings, disputes, and litigation.

Whether small business, small CLEC, or small ITCO, FailSafe and the Web Call Controller™ represent a unique, legitimate, affordable and profitable service. The Order as written is unclear as to what is being proposed, and risks the unintended consequence of depriving millions of small businesses of these benefits. It also could impact public safety, call completion, and Sunny Day 911 outages. We ask this Agency to thoughtfully consider FailSafe's requested Exemptions, since they would assuage all of these concerns without undermining the intent of their Order.

Respectfully Submitted,



Leo A. Wrobel, CEO

[www.failsafecommunications.com](http://www.failsafecommunications.com)

1 (214) 888-1300 Main Number

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<sup>8</sup> Based on the October 15, 2019 conference with this Agency, other departments are being involved and possible responses are being formulated, including but not limited to addressing these concerns in a Small Entity Compliance Guide (SECG) currently being drafted by this Agency. We also note comments from Docket 11-155 which offer other possible options: “*We thus decline to grant such an exemption at this time, but note here, as we do in the Order, that affected rate-of-return LECs and competitive LECs may seek a waiver of our rules, particularly in compelling cases that may implicate the provision of emergency services.*” (Appendix B to Report and Order in Docket 18-155, at B.5.)

<sup>9</sup> This Agency has a responsibility under the law to consider the impact of its orders on FailSafe and other Small and Medium Sized Businesses. (SMBs) The Regulatory Flexibility Act (RFA) requires agencies to consider the impact of regulatory changes on SMBs. The RFA establishes a process to evaluate proposals that achieve regulatory goals without unduly burdening SMBs, erecting barriers to competition, or stifling innovation – precisely the issues at hand here. Notwithstanding the public interest benefits, this Agency has proffered an estimate of the number of Small and Medium Sized Businesses to which these rules will apply, but has not adequately considered the impact of their Report and Order on these SMBs in the context of these concerns. (Regulatory Flexibility Act, Pub. L. No. 96-354, 94 Stat. 1164 (codified at 5 U.S.C. § 601).

**Table of Contents:**

About the Leo A. Wrobel Companies .....	3
About Our Founder .....	3
FailSafe Communications .....	4
FailSafe Revenue for Pitchers and Catchers .....	4
Is Your Company for Sale? .....	4
The FailSafe Revenue Opportunity is Real .....	5
Endorsement of Philip Diehl, 35 <sup>th</sup> Director of the U.S. Mint .....	5
911 Vulnerability .....	6
Call Overflow for 911 Providers .....	7
Call Overflow for Carriers .....	8
New Innovations (Telesentient™) Available Soon .....	9
Invitation to Investors and Beta Test Sites .....	10
TelLAWCom Labs Inc, another Leo A. Wrobel Company .....	11
Summary .....	12

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1 Mr. Wrobel's disaster recovery clients since 1986 have included: ACS, Ameritech, American Airlines Sabre Group, American Cyanamid, AT&T, Bell Labs, Bank of California, Bell South, Carlson Companies, Con Edison, City of Dallas, City of Tulsa, Dept. of Defense, EDS, Ericsson, Exxon, Fed Energy Reg Comm, Fidelity Investments, GTE, Fed Bureau Labor Stats, International Telecharge Inc, MCI, Northrup, Occidental, Pacific Gas & Elect, Pacific Health Care, Reliance Electric, Southern Bell, Southwestern Bell, State of Hawaii, Tel Aviv Stock Exchange, Tellabs, Texas Instruments, United Health Care, USAA, US Army, US Military Academy, Weyerhaeuser, and more.

2 Author of *Disaster Recovery Planning for Telecommunications* © 1990, Artech House Books, *Managing Emerging Technology for Competitive Advantage* © 1993, I.S. Management Group Inc, *Implementing a Successful Telecom Disaster Recovery Program* © 1993, IS Management Group, *Writing Disaster Recovery Plans for Telecommunications and LANs* © 1994, Artech House Books, *Understanding Emerging Network Services, Pricing and Regulation* © 1995 Artech House Books, *Business Resumption Planning (First Edition)* © 1995 Auerbach / Taylor Publishing, *The MIS and LAN Managers Guide to Advanced Telecommunications* © 1995 IEEE Publishing, *The Definitive Guide to Business Resumption Planning* © 1997, Artech House Books, *Business Resumption Planning Second Edition* © 2005 Auerbach / Taylor Publishing, and *Disaster Recovery Planning for Communications and Critical Infrastructure* © 2006 Artech House.



## **About the Leo A. Wrobel Companies**

**TelLAWCom Labs** has managed over 100 complex technology disputes for 60+ clients since 2004, directly resulting in the recovery of millions of dollars from AT&T and other major carriers. We also write disaster recovery plans for phone companies, cable companies, VoIP and enhanced service providers, 911 centers, and Fortune 1000 clients. <sup>1</sup>

**FailSafe Communications** integrates Independent Telephone Companies (ITCOs) into its cloud to restore communications for end users in times of trouble. We generate new revenue for our ITCO partners, reduce their liability for 911 failures, improve rural call completion, and save lives.

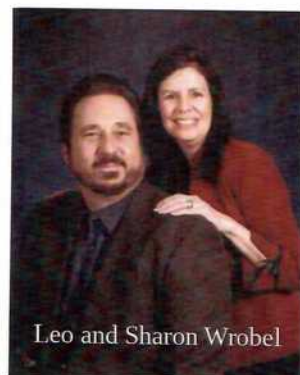
### **About Our Founder**

Leo A. Wrobel's talent for exploiting changes in laws, technology and regulation has earned him broad acclaim for over 30 years. Leo built the first computer disaster recovery center inside a telephone office in 1986. He was the first in Texas to run telephone traffic over a cable TV system in 1987. In 1994, Leo brokered a Master Services Agreement between a \$14 billion manufacturing client and two of the largest local telephone companies in the world. The result was the largest network ever installed in Texas up to that time, including all regulatory approvals.



A Collocation Pioneer: First Computer Disaster Recovery Center in a Telephone CO in 1986.

Leo was the first in the US to receive "unbundled" telecom pricing for one of his clients, a \$76 billion diversified financial cooperative – a year before the Federal Telecom Act of 1996 was even passed! As CEO of a Dallas-based CLEC, Leo took his firm from a standing start to a 50 state presence in just three years including customers in the Airline, Finance, Education and Government markets. This included the sale of a disaster recovery system of Leo's design to a major airline, and 10,200 phone lines sold by Leo, *personally*, to a major university.



Leo and Sharon Wrobel

- Guest speaker for the Chinese Academy of Sciences in Beijing, in most of the 50 states, and in other locales as diverse as Santiago Chile and Tel Aviv Israel.
- Appeared on TV news programs including *Channel 4 (Dallas) News*, *Austin at Issue (NPR)* and others.
- Author of 12 books and over 1600 trade articles. <sup>2</sup>
- CEO of NaSPA Inc. a 32 year old not-for-profit advocacy for technology and telecommunications professionals.
- Former Mayor and City Councilman.
- Experience in over 50 lawsuits and regulatory proceedings resulting in collection of millions of dollars for his clients.
- Experienced Expert Witness in complex technology claims, including recovery for cable or fiber facility damage, and high stakes billing disputes for carriers and end users.

## Exhibit 1 (Page 3 of 7)



..... "We got over \$2.5 million in business from a major airline for a nickel. In view of that fact, no one has been able to convince Sharon and I that disaster recovery must be a losing proposition....."

- Leo A. Wrobel



This statement above is not only true, it's published. See Chapter 2 of *Disaster Recovery Planning for Communications and Critical Infrastructure* by Leo A. and Sharon M. Wrobel. © Artech House Books.

The Wrobel's have done it again with FailSafe Communications. FailSafe allows Independent Telephone Companies (ITCOs) to generate significant new revenue as "Pitchers" or "Catchers." Here's how:

### FailSafe Revenue for Pitchers

Pitchers are ITCOs that sell FailSafe to their own customers, such as police, fire, 911, hospitals, call centers, banks, and others. During disasters and network congestion, the patented FailSafe system duplicates the features of a high-end phone system for the ITCO customer and allows them to reroute lines in without calling a phone company. This FailSafe system is also a true story. It's in operation right now to over 300 customers including:



Why ITCOs? ITCOs are outside major cities and telecom choke points that can be targets for terrorism. They are easier to contact in disasters when major providers can't be reached. ITCO partners are financially motivated too. Each time they send or receive calls to our cloud they earn new revenue. FailSafe or the ITCO partner collects a monthly subscription fee from the end user. When the end user exceeds a set allotment of cloud usage, the ITCO bills excess usage fees for us using the same systems they use to bill CABS or long distance. Want to learn more? For recorded information contact us at (641) 793-2018. If you like what you hear press "0" for a live person.

### FailSafe Revenue for Catchers

FailSafe leases the following services from ITCOs: Collocation, Business Lines, UNE, SS7, Interconnection, and Roof Rights. "Catchers" can expand their service area nationwide by helping us process emergency calls. A user in trouble in California can generate call traffic for a small ITCO in Utah. Want to learn more? For recorded information contact us at (641) 793-2018. If you like what you hear, press "0" to be connected to a live person.

### Is your Independent Telephone Company or CLEC For Sale?

Occasionally we acquire ITCOs and CLECs. If your company is considering a sale now or in the future, we would like to speak with you. Call us directly at (214) 888-1300 for a Non-Disclosure Agreement and discussion.





### **The FailSafe Opportunity is Real**

Thousands of Independent Telephone Companies (ITCOs) and Competitive Local Exchange Carriers (CLECs) face an uncertain future as they transition from a traditional telephone environment to cloud services. The transition is not an easy one. Carrier access revenues are down. Customers are fleeing landlines. "Triple Plays" that combine Phone, Internet and Television are dominated by players much larger than you. The financial pressure on ITCOs and CLECs has never been greater. Now you can do something about it.

**Join FailSafe and build new revenue while you help users nationwide during times of trouble. FailSafe helps your CLEC or ITCO build revenue several different ways.**

- Pitchers can sell FailSafe in their own name, e.g. ABC Telephone Company Disaster Recovery Service. Even the smallest police, fire departments, hospitals, businesses, or 911 centers can generate significant revenue, because FailSafe allows dozens of *additional call paths* into the cloud during disasters or call overflow conditions. Each *call path*, not each line, generates new revenue for the ITCO.
- Catchers can effectively expand their service area nationwide by helping us process emergency calls. A user in New York who is in trouble can generate call traffic for an ITCO in Iowa or Oregon.
- As customers disconnect landlines, an ITCO or CLEC can put that "spare" capacity back to work as a FailSafe affiliate. Subsidies increase too since they are still based in large part on landlines.
- Increase Carrier Access Billing System (CABS) revenue for now, and have a plan for when it phases out. Even after CABS revenue transitions to bill-and-keep, an affiliated ITCO or CLEC continues to bill cloud usage fees for FailSafe – with the same systems that they presently use to bill long distance and CABS!

Ask yourself this question: Should your ITCO or CLEC invest millions of dollars and one or two years to build its own "cloud" and *then* go out looking for its first customer? Or would it be better joining FailSafe, with no capital investment, and transition to the cloud with us? The choice should be obvious.

### **An Endorsement From Another FailSafe Stakeholder**



**Philip N. Diehl**  
35<sup>th</sup> Director of the U.S. Mint  
and FailSafe Stakeholder

**Philip N. Diehl** was Director of Telephone Regulation for the Texas Public Utility Commission where he was instrumental in founding the state's first Lifeline telephone service. He later became the 35<sup>th</sup> Director of the United States Mint where he increased profits from \$726 million to \$2.6 billion during the span of his leadership. Suffice it to say that Mr. Diehl knows something about money. Here is what he has to say:

*"FailSafe is an ingenious system to safeguard e-commerce, improve emergency response, and save lives. FailSafe will stop the bleeding for hundreds of Independent Telephone Companies operating in small towns, on reservations, in family businesses and in community owned cooperatives... This is why I am a proud FailSafe stakeholder and why every ITCO should consider FailSafe too."*



# 911 Vulnerability

It has been characterized as the most complicated machine ever constructed by human beings. Our public telephone system is constantly vulnerable to disruption!

**Make 911 and other Mission Critical service outages a thing of the past with a TRUE Telephone Company-grade solution.**



## The Risks Are Real for 911 Providers and ITCOs

- **911 Providers:** Over 80 buried facility disruptions occur every day in the United States that knock out telecommunications networks. You could be next.
- **Carriers:** The Federal Communications Commission (FCC) has fined carriers over \$35 million in the last two years for “Sunny Day” outages affecting 911.
- **911 Providers:** 911 centers can easily exhaust their capacity during events like severe weather or mass shootings that trigger high levels of 911 calls. A caller should ever get a fast busy when calling 911, but this is what happens.

## The Solution is a “Win-Win” for 911 Providers and ITCOs

- **Carriers:** Earn new revenue by processing 911 overflow calls for FailSafe. Reduce your own liability for 911 failures by offering 911 centers an affordable solution.
- **911 Providers.** Never deal with blocked 911 and emergency calls, *ever again*.





## **Call Overflow - How It Works for 911 Providers**



### **End Users Can Activate From Anywhere**

FailSafe or its ITCO affiliate provides the end user with a patented web-based interface that can be accessed from a personal computer or smart phone. In that interface the end user can define a default configuration for 911 overflow calls, such as directing them to a nearby 911 center where they have a mutual aid agreement.

FailSafe can brand these calls with a whisper message, such as *"The <your name> 911 center is experiencing an overflow condition and is unable to answer this call. If you can take this call please press 1. If not, press 2."* If the alternate center presses 1, the call is connected to them. If they press 2, the call goes to the next number or center you have defined such as a fire station, command van, even a cell phone in a squad car.

Other features include outbound notification, conference calling, voice mail, email, text notification and more. Most importantly, you do not have to call the phone company to implement or modify this service! Why risk not being able to reach your carrier in an emergency when YOU can stay in control from wherever you are?

Call us at the number below to arrange a demonstration.



## **Call Overflow - How It Works for ITCOs**



### **Telecommunications Disaster Recovery**

Now Available Through Your Phone Company

**Executives in Charge** Disasters go "viral" in minutes via social media. Now executives can stay in control in any emergency.

**Business and Commerce** When phones stop ringing the cash register stops. Assure callers get through to you, no matter what happens.

**Hospitals and EMS** Optional satellite service literally bypasses more widespread disasters.

**911 Centers** Critical 911 calls get through, no matter how many people call in at once.

Powered By:

 Your Company's Logo HERE 

Billing and Collection (B&C) Agreements with Independent Telcos Needed Now! Call (866) 501-8430 for more info.

Visit [www.failsafecommunications.com](http://www.failsafecommunications.com) or Call (877) 806-7003

## **It's Quick and Easy for a ITCO to Join FailSafe**

FailSafe's ITCO affiliates are classified as "Pitchers," "Catchers." If the ITCO elects to be a Pitcher it markets FailSafe under its own brand name. We can print marketing materials upon request, similar to the card above, to include in the ITCO's phone bills. In this manner the ITCO reduces its liability by offering its customer a cost-effective backup alternative, whether the customer signs up or not. Catchers process emergency calls to and from the FailSafe cloud. They also provide us with Collocation, Business Lines, UNE, SS7, Interconnection, and Roof Rights, either out of their tariffs or under contract. An ITCO can be a Pitcher *and* a Catcher if approved.

As ITCO customers disconnect landlines, FailSafe puts that "spare" capacity back to work generating revenue. Increase federal and state subsidies, which are still largely tied to landlines. Increase Carrier Access Billing System (CABS) Revenue for now, and have a plan for when it phases out. Even after CABS revenue transitions to bill-and-keep, a FailSafe-affiliated ITCO or CLEC can continue to bill cloud usage fees for FailSafe – with the same systems that you presently use to bill long distance and CABS!

## **Other FailSafe Services Include: Rural Call Completion**

The Federal Communications Commission is also concerned with Rural Call Completion rates and has levied significant fines against carriers that do not meet acceptable criteria. Luckily, the FailSafe system does more than disaster recovery. It can also be used to improve call completion rates. Rather than investing in expensive switching equipment that could easily become obsolete in a few years, why not send YOUR call surges and spikes to the FailSafe cloud? Call us at the number below for more details.

## **Exhibit 2      A Few Examples of Disruptions Just Since September 1, 2019 that Could Have Been Handled By FailSafe and the Web Call Controller <sup>TM</sup>**

- On September 3, 2019 Cox Communications phone customers in Phoenix, Las Vegas, Los Angeles, Dallas, Mesa, Oklahoma City, San Diego, Omaha, Tulsa and Kansas City experienced a major outage with nearly 3,100 outage reports.<sup>10</sup>
- On September 3, 2019 Verizon Wireless issued notice of an outage affecting 911 with the following advisory: *"If you have an emergency and cannot reach 911 call 309-345-3721 or 309-343-9151 to reach the Galesburg/Knox County 9-1-1 Communications Center."*<sup>11</sup>
- On September 6, 2019 T-Mobile customers across the nation lost cell phone service. About 5,000 people from New York City, Washington, Boston and Philadelphia reported their service was down. The outage tracker maps showed service problems were clustered in the East Coast but also appeared as far south as Miami and as far West as Seattle.<sup>12</sup>
- On September 6, 2019 Altice networks in White Plains NY experienced an outage impacting emergency phone service at multiple local police departments, along with many customers. The following advisory was issued: *"We are in communication with Altice, and are closely monitoring the situation. The County Police administrative lines are down but 9-1-1 is working. If you need to call 9-1-1 you can call from your cell phone as your landline might have a dial-tone but might not be operational."*<sup>13</sup>
- On September 7, 2019 a major outage by Optimum knocked out Internet, cable and phone services for thousands of people in New York, New Jersey and Connecticut late Friday into Saturday. The Ossining Police Department issued the following advisory on Facebook: *"Please don't tie up our lines to ask when your TV will come back on. We need those free for actual emergencies."*<sup>14</sup>
- On September 10, 2019 a cut fiber caused a major phone outage across central Minnesota, with people in that area are reporting they were unable to make or receive calls on their landline phones.<sup>15</sup>
- On September 19, 2019 the Staunton Virginia Police Department experienced issues with 911 calls placed from landlines. They released the following advisory: *"If you have an emergency, please call 911 from a cell phone or call 540.332.3842 from a landline. If you attempt to call 911 and hear a rapid busy signal please contact your telephone service provider immediately."*<sup>16</sup>
- On September 24, 2019 an area-wide 911 outage occurred in Red Oak, Midlothian, Allen, Rockwall, Plano, McKinney, and Weatherford Texas, as well as other cities in the region.<sup>17</sup>

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10 <https://www.kltv.com/2019/09/03/cox-communications-customers-report-outages-across-us/>

11 <https://wqad.com/2019/09/03/crash-blocks-east-main-street-cell-service-outage-impacts-911-calls/>

12 <https://patch.com/new-york/new-york-city/t-mobile-outages-leaves-hundreds-without-service-report>

13 <https://pelhamexaminer.com/17242/showcase/county-aware-of-altice-outage-impacting-911-many-coustomers/>

14 <https://1010wins.radio.com/articles/optimum-customers-call-911-amid-major-internet-outage>

15 <http://knsiradio.com/news/local-news/phones-out-across-central-minnesota>

16 <https://www.nbc29.com/story/41075146/staunton-police-department-experiences-partial-911-outage>

17 <https://dfw.cbslocal.com/2019/09/24/texas-cities-experiencing-911-outage/> (Note that this region just experienced a regional 911 outage in July 2019 which was documented in my last letter.)